

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DARAIUS DUBASH and

DR. FARAZ HARSINI,

*Plaintiffs,*

v.

CITY OF HOUSTON, TEXAS;

HOUSTON DOWNTOWN PARK  
CORPORATION;

and

DISCOVERY GREEN CONSERVANCY  
f/k/a HOUSTON DOWNTOWN PARK  
CONSERVANCY;

*Defendants.*

CASE NO. 4:23-cv-03556

**PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMITS**

Plaintiffs, Daraius Dubash and Dr. Faraz Harsini, respectfully request that the Court grant permission to exceed the 20-page limit for memoranda of law by 5 pages for their Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction. (ECF 15). That Memorandum of Law, filed contemporaneously with Plaintiffs' Motion for a Preliminary Injunction (ECF No. 13), is 25 pages excluding the cover sheet, tables of contents and authorities, signature block, and required certificates. (ECF No. 15).

Excess pages are warranted given the significance of the legal issues addressed. Plaintiffs' request for a preliminary injunction arises from Defendants' ongoing violation of Plaintiffs' First Amendment rights to free speech and free exercise of religion, and Plaintiff Dubash's rights under

the Texas Religious Freedom Restoration Act. Given the number of important constitutional issues involved, Plaintiffs require these extra pages to adequately present these issues to the Court.

As the certificate of conference explains, Defendants City of Houston and Houston Downtown Park Corporation were unable to provide a position on this motion. Defendant Discovery Green Conservancy does not oppose it.

For the foregoing reasons, Plaintiffs respectfully move this Court to grant this motion, give Plaintiffs leave to file a 25 page Memorandum of Law in Support of Motion for Preliminary Injunction, and direct the clerk to docket that memorandum as appropriate.

A proposed order is attached.

DATED: October 20, 2023

Respectfully Submitted,

/s/ John Greil

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**Attorneys for Plaintiffs  
Daraius Dubash and  
Dr. Faraz Harsini**

**CERTIFICATE OF CONFERENCE**

I certify that Plaintiffs' counsel attempted to confer on this motion by email on October 17, 2023, with Melissa Azadeh, an attorney with the City of Houston Legal Department who signed the waiver of service forms for both Defendant City of Houston and Defendant Houston Downtown Park Corporation. (ECF 11-12). Ms. Azadeh relayed that neither her nor her department were authorized to confer on behalf of either of those Defendants.

I also certify that Plaintiffs' counsel conferred with Richard Whiteley, counsel for Defendant Discovery Green Conservancy, who indicated that they do not oppose this motion.

/s/ John Greil  
John Greil

**CERTIFICATE OF SERVICE**

I hereby certify that on October 20, 2023, I electronically filed the foregoing Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction with the Clerk of the United States District Court for the Southern District of Texas using the CM/ECF system.

I also served copies by email on the same date to the following:

Melissa Azadeh  
City of Houston Legal Department  
melissa.azadeh@houstontx.gov

Richard Whiteley  
Bracewell, LLP  
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/s/ John Greil  
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